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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

KIMBERLY ALLEN, Personal)
Representative of the Estate of TODD) Case No. 3:04-CV-0131-JKS
ALLEN, Individually, on behalf of)
the Estate of TODD ALLEN, and on) JOINT MOTION TO EXTEND THE
behalf of the Minor Child, PRESLEY) DEADLINE FOR FILING THE
GRACE ALLEN,) COMPREHENSIVE PROPOSED
) PRETRIAL ORDER
Plaintiff,)
)
vs.)
) FILED ON SHORTENED TIME
UNITED STATES OF AMERICA,)
)
Defendant.)
)

The parties respectfully move this Court to allow Counsel in the above-captioned case to file the Proposed Pretrial Order on June 6, 2007. Counsel have met over the phone and are in the process of working on a joint proposed pretrial order. However, counsel have been unable to complete the proposed pretrial order as of May 24th for the following reasons:

counsel have been preparing for trial in this matter, including taking the trial testimony of two of plaintiff's experts. At the same time, both counsel have had other litigation responsibilities involving other cases. Mr. Guarino will be out of his office the week of May 28 traveling and attending a seminar at the federal National Advocacy Center in South Carolina.

Counsel request that they have until June 6th to file the Proposed Pretrial Order as Mr. Guarino will be out of his office the week of May 28th at training in South Carolina making completion of the Proposed Pretrial order the week of May 28th uncertain.

FRIEDMAN RUBIN & WHITE
Counsel for Plaintiffs

DATED: _____

By: /s/ Donna J. McCready

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NELSON P. COHEN
UNITED STATES ATTORNEY

DATED: _____

By: /s/ Gary M. Guarino

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CERTIFICATE OF SERVICE

I certify that on the 25 May 2007, a copy of the foregoing Joint Motion to Extend the Deadline for Filing the Comprehensive Proposed Pretrial Order was served electronically on:

Gary M. Guarino
Assistant U.S. Attorney
Office of the U. S. Attorney
222 W. 7th Ave., #9
Anchorage, AK 99513-7567

/s/ Donna J. McCready

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